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**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re:

LOTUS EXIM INTERNATIONAL, INC.

Debtor.

Chapter 7

Case No.: 18-15957 (VFP)

Hearing Date: Tuesday, June 19, 2018
Hearing Time: 10:00 a.m.
Honorable Vincent F. Papalia, U.S.B.J.

NOTICE OF MOTION TO VACATE THE AUTOMATIC STAY

TO: Sam Della Fera, Esq.
347 Mount Pleasant Ave
Suite 300
West Orange, New Jersey 07052
Attorneys for Debtor

Lotus Exim International, Inc.
16 Leilarts Lane
Elmwood Park, New Jersey 07407
Debtor

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Nicholas J. Delzotti, Chapter 7 Trustee
P.O. Box 20117
Newark, New Jersey 07101

United States Trustee
One Newark Center
1085 Raymond Blvd, Suite 2100
Newark, New Jersey 07102

PLEASE TAKE NOTICE that on Tuesday, June 19, 2018, at 10:00 a.m. in the forenoon or as soon thereafter as counsel may be heard, the undersigned, attorneys for Creditor, TCF EQUIPMENT FINANCE, a Division of TCF National Bank (hereinafter "TCF"), will move before the Honorable Vincent F. Papalia, U.S.B.J., United States Bankruptcy Court for the District of New Jersey, 50 Walnut Street, Newark, New Jersey 07101, for an Order vacating the automatic stay and permitting TCF to repossess and sell certain collateral, more particularly described in the attached pleadings.

Upon the return date, counsel shall rely upon the annexed Affidavit of Gregory A. Payer, an employee of Creditor, TCF.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case (If you do not have an attorney, you may wish to consult one).

If you do not want the Court to grant Creditor, TCF's, Motion, or if you want the Court to consider your views on the within Motion, then on or before **June 12, 2018**, you or your attorney must file with the Court a written opposition response to TCF's Motion explaining your position and stating with particularity the basis of your opposition to the within Motion pursuant to D.N.J. LBR 9013-1(d), et seq. Your response must be filed with the Bankruptcy Court Clerk at the United States Bankruptcy Court, District of New Jersey, 50 Walnut Street, Newark, New Jersey 07102.

If you mail your response to the Court for filing, you must mail it early enough so the Court will receive it on or before the date stated above.

You must also mail a copy to:

Charles A. Gruen, Esq.
Law Offices of Charles A. Gruen
381 Broadway, Suite 300
Westwood, New Jersey 07675
Attorneys for TCF EQUIPMENT FINANCE, a Division of TCF
National Bank

If you are opposing the Order that TCF is seeking from the Court, you must attend the hearing scheduled to be held June 19, 2018, at 10:00 a.m., at the United States Bankruptcy Court, 50 Walnut Street, Newark, New Jersey 07102, the Honorable Vincent F. Papalia, U.S.B.J., presiding.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Motion and may enter an Order granting that relief.

LAW OFFICES OF CHARLES A. GRUEN
Attorneys for Creditor,
TCF EQUIPMENT FINANCE, a Division of
TCF National Bank

By: /s/ *Rosa Amica-Terra*
ROSA AMICA-TERRA

Dated: May 23, 2018